

EVE H. WAGNER (State Bar No. 126471)
ANTHONY D. SBARDELLATI (State Bar No. 246431)
SAUER & WAGNER LLP
1801 Century Park East, Suite 1150
Los Angeles, California 90067
Tel: (310) 712-8100; Fax: (310) 712-8108
E-mail: ewagner@swattys.com; asbardellati@swattys.com

JEREMY FEIGELSON (of counsel)
(Pro Hac Vice Application Pending)
BRUCE P. KELLER (of counsel)
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Tel: (212) 909-6000; Fax: (212) 909-6836
Email: jfeigelson@debevoise.com; bpkeller@debevoise.com

Attorneys for Defendant Prometheus Global Media, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PENSKE MEDIA CORPORATION,
dba PMC, a Delaware corporation,

Plaintiff,

v.

PROMETHEUS GLOBAL MEDIA,
LLC, a Delaware limited liability
company d/b/a
hollywoodreporter.com; and DOES 1
through 10, inclusive,

Defendants.

Case No.: CV 11-7560-JST (MRW)

Hon. Josephine Staton Tucker
Magistrate: Hon. Michael R. Wilner

**DISCOVERY MATTER:
DECLARATION OF WILLIAM C.
WEEKS IN OPPOSITION TO
PLAINTIFF PENSKE MEDIA
CORPORATION'S
SUPPLEMENTAL MEMORANDUM**

**MEMORANDUM IN OPPOSITION
TO MOTION (filed concurrently)**

Action filed: September 14, 2011
Discovery Cut-off: November 9, 2012
Trial Date: July 9, 2013

1 I, William C. Weeks, declare as follows:

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3 1. I am a member of the bar of the State of New York and an associate in
4 the law firm Debevoise & Plimpton LLP, counsel for defendant Prometheus
5 Global Media, LLC (“Prometheus”). My law firm works on this matter with Sauer
6 & Wagner LLP, Prometheus’s counsel of record. Two partners in my firm, Jeremy
7 Feigelson and Bruce P. Keller, have appeared as “Of Counsel” on Prometheus’s
8 filings in this case. Mr. Feigelson’s pro hac vice application is pending. I make
9 this declaration of my personal, firsthand knowledge and, if called and sworn as a
10 witness, I could and would testify competently thereto.

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12 2. Counsel for Penske Media Corporation (“Penske”), Steven Stiglitz,
13 initially provided a Notice of Motion to Compel and Joint Stipulation to
14 Prometheus’s counsel on October 17, 2012. I had a telephone conversation with
15 Mr. Stiglitz in which I requested that Penske provide a revised Joint Stipulation
16 that complied with the formal requirements of Local Rule 37-2.2. Mr. Stiglitz
17 agreed to do so, with the understanding that doing so would not re-start the seven-
18 day period for Prometheus’s response under Local Rule 37-2.2 – I agreed to this.
19 Subsequently, the parties decided to jointly request an extension of all case
20 management dates. At no time did I make any agreement with Mr. Stiglitz with
21 respect to what would happen if the Court denied that request and Penske
22 attempted to renew its motion. After the Court denied the parties’ request, Mr.
23 Stiglitz provided Prometheus’s counsel with the joint stipulation, which he had
24 revised in form in an attempt to comply with the requirements of Local Rule 37-
25 2.1.

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1 I declare under penalty of perjury under the laws of the United States and
2 California that the foregoing is true and correct.

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4 Executed on December 5, 2012, at Los Angeles, California

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6 /s/ William C. Weeks
7 William C. Weeks
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